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Attorneys for Defendants County of Siskiyou; Jeremiah LaRue and Jesus Fernandez, in their official capacities as members of the Siskiyou County Sheriff's Department and in their individual capacities; Brandon Criss, Ed Valenzuela, Michael N. Kobseff, Nancy Ogren, and Ray A. Haupt, in their official capacities as members of the Siskiyou County Board of Supervisors and in their individual capacities; Edward Kiernan, in his official capacity as County Counsel for Siskiyou County and in his individual capacity; and DOES 1-100.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

Dilevon Lo, Jerry Vang, Nathan Thao, Mao Thao, Pao Lee, Antonio Lee, Koua Lee, Nhia Thai Vang, Zeng Lee, Der Lee and Khue Cha

Plaintiffs,

VS.

County of Siskiyou; Jeremiah LaRue and Jesus Fernandez, in their official capacities as members of the Siskiyou County Sheriff's Department and in their individual capacities; and Brandon Criss, Ed Valenzuela, Michael N. Kobseff, Nancy Ogren, and Ray A. Haupt, in their official capacities as members of the Siskiyou County Board of Supervisors and in their individual capacities; Edward Kiernan, in his official capacity as County Counsel for Siskiyou County and in his individual capacity; and DOES 1-100.

## Defendants.

Case No.: 2:21-cv-00999-KJM-DMC

**DECLARATION OF RAY A. HAUPT IN  
SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

Complaint Filed: June 4, 2021

First Amended Complaint Filed: July 15, 2021

1 I, Ray A. Haupt, do declare as follows:

2 1. I am the current Chairman for the Board of Supervisors for Siskiyou County and  
3 have been in that capacity since I assumed office on January 1, 2014. In my role as Chairman for  
4 the Board of Supervisors I am intimately familiar with the process and the intended purposes of the  
5 three ordinances in question.

6 2. The ordinances in question are intended to address several vital concerns to the  
7 citizens of Siskiyou County. In no particular order, those concerns include the following, as I and  
8 my fellow Board members understand them:

- 9 a) Conservation of precious ground water during an extreme drought for  
10 reasonable and beneficial uses and ending its observed waste as it is used in  
11 mass quantities for illegally cultivating cannabis. Illegal cannabis in  
12 Siskiyou County is generally grown in totes or containers (thus applied  
13 groundwater does not return to underlying aquifers) and it is subject to  
14 destruction by law enforcement or administrative abatement (further  
15 eliminating any possible beneficial use of groundwater on it);
- 16 b) To prevent unlawful cannabis cultivation which in this County has been  
17 reported and observed to occur in a significantly higher magnitude in the  
18 Mount Shasta Vista and Butte Valley areas than anywhere else in Siskiyou  
19 County. The illegal cannabis cultivation has led to excessive crime including  
20 violent felonies;
- 21 c) As reported and observed by key County personnel, including but not limited  
22 to the Sheriff of Siskiyou County, the concentration of cannabis cultivation  
23 greenhouses in Mount Shasta Vista and Butte Valley vastly exceed other  
24 areas of the County and has led to significant damage to the environment  
25 through unlawful discharge of chemicals, human waste, and trash;
- 26 d) To concentrate limited law enforcement resources where they could do the  
27 most good to address the above concerns; and
- 28 e) Concern for the health and safety of citizens illegally residing in Mount

Shasta Vista in unpermitted dwellings without the benefit of sanitary water, sewage, approved fire protection, approved electrical, and approved structural buildings.

3. At no time was it or is it the intent of the Board to target a specific racial community, including the Hmong community. All of our citizens are highly and equally valued. The areas of focus for the water truck ordinance is only to further the purposes for the ordinances as set forth above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this was executed on this 13th day of August, 2021 in Siskiyou County, California.

/s/ Ray A. Haupt  
Ray A. Haupt